

UNITED STATES DEPARTMENT OF THE INTERIOR  
OFFICE OF HEARINGS AND APPEALS  
INTERIOR BOARD OF LAND APPEALS

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BOARD OF LAND APPEAL

IBLA 2017-XXXX

Ion/GX Technology Corporation

E14-003

2017-140

Application for Permit to Conduct  
Geophysical Exploration for Mineral  
Resources on the Outer Continental Shelf

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Pursuant to 43 C.F.R. § 4.405, Ion/GX Technology Corporation (“Appellant”) respectfully requests an extension of its deadline to file a Statement of Reasons in this appeal. Specifically, Appellant requests that the deadline for the filing of its Statement of Reasons be extended to a date that is 30 days after the date upon which the administrative record is lodged by the Bureau of Ocean Energy Management (“BOEM”). The reasons for this extension request are as follows:

Appellant filed this appeal on March 6, 2017. In addition to this appeal, five related appeals were filed by similarly situated appellants, TGS (E14-001), WesternGeco, LLC (E14-004), CGG Services (U.S.) Inc. (E14-005), Spectrum Geo, Inc. (E14-006), and MultiKlient Invest AS and International Association of Geophysical Contractors (E14-007) (collectively, “Related Appellants”), all of whom are also represented by counsel. The Related Appellants have each filed requests for the same extension sought by Appellant herein.

Pursuant to 43 C.F.R. § 4.412 and 43 C.F.R. § 4.22(e), Appellant’s Statement of Reasons is due to be filed on April 5, 2017. However, BOEM has not yet lodged the administrative record in this appeal or in any of the five related appeals identified above. Counsel for BOEM has indicated that the administrative record in these appeals will not be lodged before Appellant’s Statement of Reasons is due under 43 C.F.R. § 4.412.

To effectively pursue this appeal, it is critical for Appellant to review the administrative record before filing its Statement of Reasons and to support its Statement of Reasons with citations to documents in the administrative record. Appellant will be substantially prejudiced if it is required to file its Statement of Reasons before the administrative record is available, because it will have been unable to review and consider the agency documents and correspondence that led to, and supported, BOEM's decision to deny Permit Application E14-003. Accordingly, Appellant respectfully requests that the deadline for the filing of its Statement of Reasons be extended to a date that is 30 days after the date upon which the BOEM promptly lodges the administrative record. *See* 43 C.F.R. § 4.411(d)(3) (requiring BOEM to "promptly" lodge the administrative record).

Counsel for Appellant conferred with counsel for BOEM and for counsel for Related Appellants in advance of the filing of this extension request. BOEM's counsel stated that BOEM does not oppose this extension request. Related Appellants' counsel stated that Related Appellants does not oppose this extension request.

DATED: March 27, 2017.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

I certify that on March 27, 2017 the foregoing Unopposed Motion for Extension of Time was sent via electronic mail to:

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